

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	
Commission's Rules to Establish Rules for)	MB-Docket No. 03-185
Digital Low Power Television, Television Translator, and)	
Television Booster Stations and to Amend Rules)	
for Digital Class A Television Stations)	

STATEMENT IN SUPPORT OF CBA'S COMMENTS
TO ESTABLISH A NEW DIGITAL TV TRANSLATOR SERVICE

H&R PRODUCTION GROUP, LLC ("H&R"), by its attorneys, hereby files its Statement supporting the Comments of the Community Broadcasters Association ("CBA") urging the adoption of certain new rules to permit digital operation of LPTV translators. In support thereof, the following is shown:

1. H&R is the licensee of WBWP-LP, Channel 57, West Palm Beach, Florida. Station WBWP-LP broadcasts each week over 20 hours of live, original programming and five hours of pre-produced TV programming to the West Palm Beach market and neighboring communities. Its programming philosophy, "together we make a difference" is continually reflected in its locally originated programmed, attuned to the needs and interests of its diverse LPTV service area. Importantly, as a LPTV translator licensee, H&R is vitally concerned that LPTV stations in America continue to flourish in a conducive regulatory environment and that such stations continue to provide free over the air programming to urban areas in a digital mode. It is for this reason that H&R fully supports CBA's Comments herein.

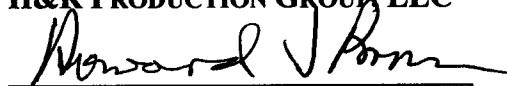
2. More specifically, on August 29, 2003 the Commission issued a Notice of Proposed Rule Making ("Notice") seeking to bring digital LPTV service to discrete geographic

communities in urban areas, thus taking another important step toward the transition to a nationwide DTV service. In its Notice, the Commission has tentatively concluded that digital LPTV stations should be technically capable of retransmitting the complete signals of DTV broadcast stations for reception by the general public. Furthermore, the Commission is mindful of the challenges presented by limited spectrum availability and the limited budgets of many LPTV stations such as WBWP-LP. Accordingly, the agency seeks comments on various measures to facilitate the availability and permitted use of TV channels for digital operations particularly with respect to the transition of existing analog service.

3. Recognizing the FCC's valid concerns, CBA has urged the FCC to hasten the authorization of digital capability for LPTV translators, while not upsetting the current relationship between existing TV translators and LPTV stations. In this connection, CBA believes that the rapid inauguration of a new digital LPTV translator service will help ensure the continued delivery of free broadcast services to urban areas such as West Palm Beach which is served by WBWP-LP. CBA's proposed rules and other procedural proposals go a long way towards making this objective a reality. In other words, there is no justifiable public interest reason to deprive citizens of urban areas the benefits of free digital TV reception via LPTV translators. In fact, the Commission's Notice expressly recognizes that many LPTV stations such as WBWP-LP provide "niche" programming, frequently locally produced, to members of specific ethnic, racial or special interest communities in urban areas.

4. In sum, we believe that CBA has presented cogent and compelling reasons for prompt adoption of certain rules and regulations by the FCC to expedite over-the-air digital LPTV translator reception in America's major and other markets. Accordingly, CBA's Comments ought to be promptly adopted by the FCC.

Respectfully submitted,
H&R PRODUCTION GROUP, LLC



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November 24, 2003